



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
OFFICE OF ENVIRONMENTAL ASSISTANCE
SMALL BUSINESS ENVIRONMENTAL ASSISTANCE PROGRAM
8TH FLOOR, L&C ANNEX, 401 CHURCH STREET
NASHVILLE, TN 37243-1551

Immediate Attention Needed – New Environmental Regulations Information Due – October 29, 2008

Dear Plating and Polishing Facility owner:

This letter is to inform you of the new Federal environmental rule that may affect your business. You should review the information enclosed and determine if the rule applies to your business. The rule requires action by **October 29th, 2008**, for affected businesses. Failure to submit required information could result in a non compliance determination and possible penalties.

What is the Rule's Purpose?

The Environmental Protection Agency published new regulations on July 1, 2008, that impact plating and polishing facilities. The rule was issued to reduce vapors from facilities that contain cadmium, chromium, manganese, nickel, lead, and other harmful chemicals.

What does the Rule Require?

• An Initial Notification

The regulations require affected sources to notify regulatory agencies that the rule applies to them. This notification requirement is referred to as an Initial Notification and is due by October 29, 2008. You must state that the Notification is submitted to meet the requirements of the Federal National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations 40 CFR 63 Subpart WWWW §63.11509(b) and 40 CFR 63 Subpart A, §63.9(b). The Initial Notification must contain facility ownership and operation information. A sample Initial Notification is provided for your convenience. You are not required to use this sample and may choose your own format to submit information required by the rule. You must notify the State Air Pollution Control Agency at the address listed on the Sample Initial Notification. **If your facility is in Davidson, Hamilton, Knox, or Shelby counties, please contact your local air pollution control program for the necessary response to this environmental rule.**

• A Notification of Compliance

Please note that existing facilities have until July 1, 2010 to actually comply with the rules' operating requirements. A Notification of Compliance Status must be submitted once a facility is in compliance with the rule, not later than July 1, 2010 for existing affected source. New affected sources (commenced construction/reconstruction after March 14, 2008) must comply with the rule, and submit both an Initial Notification and a Notification of Compliance Status upon startup. Please call me if you are a new source or want to submit your Notification Compliance Status at this time.

When is the Initial Notification due?

Existing source initial notifications are due not later than **October 29, 2008, or within 120 calendar days** after your Plating and Polishing Facility becomes subject to the rule, whichever is later.

Who must respond and submit an Initial Notification?

This notification must be submitted by the owner or operator of a plating and polishing facility that:

- has emissions of less than 10 tons per year of any single hazardous air pollutant (HAP) or less than 25 tons per year of a combination of two or more HAPs.
- is engaged in one or more of the processes listed in Section 2 of the enclosed Sample Initial Notification and use materials that contain or have the potential to emit Plating and Polishing metal HAP.

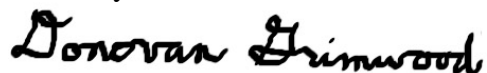
Who is NOT required to submit the notification?

If your facility is

1. subject to the requirements of 40 CFR part 63, subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks)
2. a research and development process unit, as defined in § 63.11511 of the enclosed rule
3. Process units that are used strictly for educational purposes
4. Thermal spraying conducted to repair surfaces
5. Dry mechanical polishing conducted to restore the original finish to a surface
6. Any plating or polishing process that **does not use** any material that contains cadmium, chromium, lead, or nickel in amounts of 0.1 percent or more by weight, or that contains manganese in amounts of 1.0 percent or more by weight, as reported on the Material Safety Data Sheet for the material

A brochure and a copy of the rule are enclosed. There is help available with understanding this new air pollution regulation. The Tennessee Small Business Environmental Assistance Program (SBEAP) offers free, confidential technical assistance with environmental questions. Donovan Grimwood is the SBEAP contact for Plating and Polishing Operations. He can be reached toll free at **1-800-734-3619** (615-532-4966 in Nashville) or through email at BGSBEAP@state.tn.us. Also, feel free to visit the Program's web page at www.state.tn.us/environment/ea/sbeap.

Sincerely,



Donovan Grimwood, Environmental Specialist
Small Business Environmental Assistance Program

Enclosures